

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW MEXICO

2015 JUL 23 AM 11:37

CLERK-LAS CRUCES

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESUS SALAS-AGUAYO, a.k.a.

"Chuyin,"

ELMY HERMOSILLO TRUJILLO, a.k.a.

"Potrillo," a.k.a. "Petro," a.k.a. "9,"

CARLOS ARTURO QUINTANA, a.k.a.

"Ochenta," a.k.a. "80,"

RAUL CORELLA-HERNANDEZ, a.k.a.

"Ruso," a.k.a. "El Valle," a.k.a.

"Vladimir,"

JORGE ADRIAN ORTEGA-GALLEGOS,

a.k.a. "Naranjas,"

GUADALUPE A. PRIETO,

JESUS ISAAC

RODRIGUEZ-CONTRERAS,

CLAUDIO RENE ROJO-NEVAREZ,

JORGE OLIVAS NEVAREZ, a.k.a.

"Compa Chuy,"

GUILLERMO CASTILLO-RUBIO,

a.k.a. "Pariente," and

MARCO ANTONIO GUZMAN-ZUNIGA,

a.k.a. "Brad Pitt,"

Defendants.

CRIMINAL NO. 12-3109 JB

Counts 1 and 3: 21 U.S.C. § 963:
Conspiracy;

Count 2: 18 U.S.C. § 1201(a)(1) and (d):
Attempted Kidnapping; 18 U.S.C. § 2:
Aiding and Abetting;

Count 4: 21 U.S.C. § 846: Conspiracy;

Counts 5 and 7: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(C): Possession With Intent to
Distribute 50 Kilograms and More of
Marijuana; 18 U.S.C. § 2: Aiding and
Abetting;

Count 6: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B): Possession With Intent to
Distribute 100 Kilograms and More of
Marijuana; 18 U.S.C. § 2: Aiding and
Abetting;

Count 8: 21 U.S.C. §§ 848(a) - (c):
Continuing Criminal Enterprise; 18 U.S.C. §
2: Aiding and Abetting.

THIRD SUPERSEDING INDICTMENT

The Grand Jury charges:

Introduction

1. The Juarez Cartel, also known as the Vicente Carrillo Fuentes Organization ("VCFO"), Cartel de Juarez, or La Linea, is a transnational criminal enterprise based in Chihuahua, Mexico. The VCFO is responsible for smuggling tons of narcotics from Mexico into the United States each year. The VCFO is one of the oldest and most powerful criminal

organizations in Mexico. Since its beginnings, the cartel has focused on drug trafficking, but has expanded into other criminal activities such as human trafficking, arms trafficking, kidnapping, extortion, and large-scale commercial gasoline theft from the Mexican government.

2. The origins of the Juarez Cartel go back to the 1980s, when the Juarez area was under the control of Rafael AGUILAR-Guajardo's control. In 1993, AGUILAR-Guajardo was killed in Cancun in what may have been an inside job by his top lieutenant, Amado CARRILLO-Fuentes ("ACF"). The organization grew immensely under ACF, who pursued negotiations over fighting when dealing with other Mexican cartels. Under ACF, the cartel expanded and ultimately gained control of about half of all Mexican drug trafficking routes. ACF extended his operations into Central America and South America and earned the nickname "El Señor de los Cielos" (Lord of the Skies) from his practice of using commercial aircraft to move thousands of tons of Colombian cocaine into Mexico. As ACF's cartel grew, so did his profile with the Mexican and American governments, resulting in multiple indictments against him. ACF attempted to undergo plastic surgery in 1997 to change his appearance; however, he unexpectedly died during the operation.

3. ACF's brother, Vicente CARRILLO-Fuentes ("VCF") took over as the leader; however, a power struggle quickly ensued. After some infighting, VCF established a firm command of the cartel and briefly joined forces with the leaders of the Sinaloa Cartel to divvy up smuggling routes and resources. The union of the two criminal enterprises was known as "the Federation." The partnership was short lived. A top lieutenant within the VCFO killed two Sinaloa Cartel associates for failing to pay the VCFO for use of the Juarez corridor smuggling routes. The Sinaloa Cartel responded by murdering VCF's brother, Rodolfo, and

his wife as they walked out of a movie theatre in September 2004. Shortly thereafter, VCF's men exacted revenge by killing the brother of Sinaloa Cartel leader Joaquín GUZMAN-Loera ("El Chapo"). From that point, the war was on and the intense rivalry resulted in Ciudad Juarez becoming one of the most violent places in the world.

4. The VCFO has traditionally controlled the state of Chihuahua, with their strong-hold being Ciudad Juarez. The Juarez Cartel also maintains an active presence throughout the states of Sinaloa, Durango, and Coahuila. The Juarez Cartel is responsible for disseminating multi-ton loads of cocaine, marijuana, and other illicit drugs throughout the United States each year.

5. Much of the success of the VCFO is due to their long-established relationship with corrupt state and local police commanders, politicians, and military leaders. The Juarez Cartel formalized a relationship with the Zetas Cartel, and the two organizations have conducted paramilitary training together in Chihuahua and elsewhere.

6. Jesus SALAS-Aguayo is the day-to-day leader and overall manager of the VCFO. SALAS-Aguayo has operational control over the VCFO's drug distribution, revenue collection, enforcement operations, payments to corrupt officials, communications, and liaison to other cartels. To equate his position to a traditional business model, SALAS-Aguayo is the CEO of the VCFO. SALAS-Aguayo has close to a dozen "plaza bosses" that serve as regional managers all over Chihuahua. The plaza bosses report daily activities and pertinent business information to SALAS-Aguayo. SALAS-Aguayo is a former plaza boss and understands the significance and importance of the position. SALAS-Aguayo, before being promoted to the #2 leadership position, had been in charge of the Villa Ahumada Plaza – a location that was critical to the distribution of the VCFO's marijuana distribution operation

(which is more fully explained in the following pages). One of SALAS-Aguayo's trusted confidants, JORGE ADRIAN ORTEGA-GALLEGOS, a.k.a. "Naranjas" serves as the VCFO's "La Oficina" or communications manager. La Oficina serves as the central dispatch for the VCFO. Should a VCFO member need another member's phone number or radio frequency, La Oficina serves as the point of contact. If rival cartel members or Army patrols are active in a certain plaza, the plaza boss contacts La Oficina and the message is transmitted to all of the other plazas. La Oficina also relays information from SALAS-Aguayo out to the various VCFO regions. SALAS-Aguayo has direct control over the VCFO's vast drug distribution operations, which primarily consists of cocaine and marijuana sales to retailers in the United States.

7. Cocaine is not manufactured in Mexico; rather it is imported from South America and transported to destination cities within Mexico. The VCFO receives much of its cocaine shipments via clandestine aircraft that land on VCFO-maintained landing strips in the remote mountains of Namiquipa, Chihuahua, and similar locations. The cocaine is off-loaded under heavy VCFO protection and driven out of the mountains and secured in stash houses. The cocaine is then accounted for and reported to higher ups within the VCFO. Cocaine is one of the VCFO's most valuable products and is closely monitored and protected. As the overall manager, SALAS-Aguayo is responsible for ensuring the VCFO's cocaine reaches the northern portion of Chihuahua and is ultimately smuggled into the United States. SALAS-Aguayo's involvement doesn't end there, however; he is also responsible for ensuring the proceeds return to VCFO coffers in Mexico. Any disruption in the process is investigated thoroughly by the VCFO and reported back to SALAS-Aguayo. Suspected theft,

police cooperation, sloppy work, or careless handling by any person within the process is dealt with harshly by the VCFO.

8. The VCFO's marijuana operations are run in a similar manner; however, because the marijuana is produced in Chihuahua, Mexico, the VCFO utilizes additional personnel and resources to manufacture and distribute it. The vast majority of Mexican-grown marijuana is produced in the "Golden Triangle," referring to the area in the Sierra Madre Occidental surrounding the three-way junction of the borders of the Mexican states of Chihuahua, Durango, and Sinaloa. The VCFO utilizes native Mexican Indians to grow the majority of their marijuana. Rather than pay the Indian farmers, they provide the tribes with food, clothing, blankets, medical supplies, and medical personnel to treat and provide basic health services. The Indians grow the marijuana under the supervision and protection of the cartel. Once the marijuana is ready to be harvested, the cartel utilizes the Indians to harvest the plants and load them onto Juarez Cartel trucks. The trucks transport the marijuana to cartel ranches to sort the plants, count them, hang them out to dry, and then bundle them into sacks to be transported to Villa Ahumada for further processing. Plaza bosses within the area are free to mimic the process at remote grow locations in Chihuahua, but are restricted in whom they may sell the marijuana to. For example, a plaza boss cannot sell marijuana to a rival cartel member. Los Lince (armed enforcers) frequently patrol the farms, processing ranches, and transportation routes to ensure all members are following the cartel's protocol. Drug weights, package marking labels, transportation routes, vehicles, and timelines are reported to the cartel's logistical boss and communications manager ("La Oficina").

9. Marijuana loads are picked up by the cartel's transportation team every 10-14 days. The transportation team utilizes flatbed semi-trucks, dump trucks, vans, and container trucks –

depending on the size of the load. The transportation team usually travels under marked police vehicle escort. Marijuana loads are transported to Villa Ahumada, where they are weighed, accounted for, processed and often repackaged to accommodate smaller load vehicle sizes. From Villa Ahumada, drug loads are shipped north to Ciudad Juarez, west to Palomas, or east to Ojinaga. Those three plazas serve as the VCFO's primary smuggling routes into the United States.

10. It is estimated that during any 12 month period, the VCFO receives hundreds of millions of dollars in gross receipts from their operations.

Count 1

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

From on or about February 2011 through on or about March 2011, in the Republic of Mexico, and elsewhere, the defendants, **JESUS SALAS-AGUAYO, ELMY HERMOSILLO TRUJILLO, CARLOS ARTURO QUINTANA, RAUL CORELLA-HERNANDEZ**, and **JORGE ADRIAN ORTEGA-GALLEGOS**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit the following offense against the United States, specifically, to distribute a controlled substance, 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana, intending and knowing that said controlled substance would be unlawfully imported into the United States, contrary to 21 U.S.C. §§ 959(a), 960(a)(3) and (b)(2)(G).

In violation of 21 U.S.C. § 963.

Count 2

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

On or about March 2011, in the Republic of Mexico, the District of New Mexico, and elsewhere, the defendants, **ELMY HERMOSILLO TRUJILLO, GUILLERMO CASTILLO-RUBIO**, and **MARCO ANTONIO GUZMAN-ZUNIGA**, attempted to unlawfully and knowingly seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise and willfully transport Jane Doe in interstate and foreign commerce.

In violation of 18 U.S.C. §§ 1201(a)(1), (d), and 2.

Count 3

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

From on or about April 2013 through on or about February 14, 2014, in the Republic of Mexico, and elsewhere, the defendants, **JESUS SALAS-AGUAYO, GUADALUPE A. PRIETO, JESUS ISAAC RODRIGUEZ-CONTRERAS, CLAUDIO RENE ROJO-NEVAREZ**, and **JORGE OLIVAS NEVAREZ**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit the following offense against the United States, specifically, to distribute a controlled substance, 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana, intending and knowing that said controlled substance would be

unlawfully imported into the United States, contrary to 21 U.S.C. §§ 959(a), 960(a)(3) and (b)(2)(G).

In violation of 21 U.S.C. § 963.

Count 4

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

From on or about April 2013, and through on or about February 14, 2014, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JESUS SALAS-AGUAYO, GUADALUPE A. PRIETO, JESUS ISAAC RODRIGUEZ-CONTRERAS, CLAUDIO RENE ROJO-NEVAREZ, and JORGE OLIVAS NEVAREZ**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit the following offense against the United States, specifically, distribution of 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana, contrary to 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

In violation of 21 U.S.C. § 846.

Count 5

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

On or about April 23, 2013, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JESUS SALAS-AGUAYO and JORGE OLIVAS NEVAREZ**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 kilograms and more of a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 6

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

On or about September 19, 2013, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **JESUS SALAS-AGUAYO, GUADALUPE A. PRIETO, JESUS ISAAC RODRIGUEZ-CONTRERAS, CLAUDIO RENE ROJO-NEVAREZ, and JORGE OLIVAS NEVAREZ**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 100 kilograms and more of a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 7

Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.

On or about February 14, 2014, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **JESUS SALAS-AGUAYO, GUADALUPE A. PRIETO, and JORGE OLIVAS NEVAREZ**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 kilograms and more of a mixture and substance containing a detectable amount of marijuana.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 8

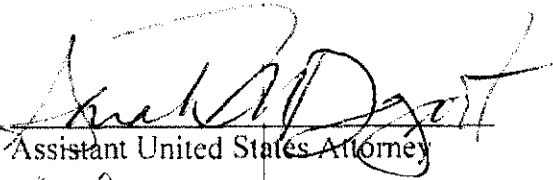
Paragraphs 1 through 10 of this Third Superseding Indictment are hereby realleged and incorporated by reference herein.


Beginning in or about February 2011, and continuing up to and including February 2014, in the District of New Mexico, and elsewhere, the defendant, **JESUS SALAS-AGUAYO**, unlawfully, knowingly and intentionally engaged in a continuing criminal enterprise, in that the defendant knowingly and intentionally violated provisions of 21 U.S.C. §§ 841, 846 and 963, including but not limited to the violations alleged in Counts 1 and 3 through 7 of this Indictment, which Counts are realleged and incorporated herein by reference as if fully set forth in this Count, all of which violations were part of a continuing series of violations of 21 U.S.C., undertaken by the defendant in concert with at least five (5) other persons with respect to whom defendant occupied a position as organizer, supervisor, and manager, and from which continuing series of violations the defendant herein obtained substantial financial income and resources, and the violations included, without limitation, the following: (1) conspiracy to distribute 100 kilograms and more of marijuana knowing and intending that it will be unlawfully imported into the United States from on or about February 2011, through on or about March 2011; (2) conspiracy to distribute 100 kilograms and more of marijuana knowing and intending that it will be unlawfully imported into the United States from on or about April 2013 through on or about February 2014; (3) conspiracy to distribute 100 kilograms and more of marijuana from on or about April 2013 through on or about February 2014; (4) possession with intent to distribute 50 kilograms and more of marijuana in April 2013; (5) possession with intent to distribute 100 kilograms and more of marijuana in September 2013; and (6) possession with intent to distribute 50 kilograms and more of marijuana in February 2014.

In violation of 21 U.S.C. §§ 848(a), (b) and (c), and 18 U.S.C. § 2.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney


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